

DOLORES Y. LEAL (134176)
OLIVIA FLECHSIG (334880)
ALLRED, MAROKO & GOLDBERG
6300 Wilshire Blvd. Suite 1500
Los Angeles, CA 90048-5217
(323) 653-6530
dleal@amglaw.com
oflechsig@amglaw.com

Attorneys for Plaintiff MARK SNOOKAL

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership
Including Professional Corporations
TRACEY A. KENNEDY, Cal Bar No. 150782
ROBERT E. MUSSIG, Cal. Bar No. 240369
H. SARAH FAN, Cal. Bar No. 328282
350 South Grand Avenue, 40th Floor
Los Angeles, CA 90071-3460
Telephone: 213.620.1780
E-mail: tkennedy@sheppardmullin.com
rmussig@sheppardmullin.com
sfan@sheppardmullin.com

Attorneys for Defendant.
CHEVRON U.S.A. INC.,
a Pennsylvania corporation

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,)	CASE NO.: 2:23-cv-6302-HDV-AJR
)	
Plaintiff,)	
)	JOINT EXHIBIT LIST
vs.)	
)	
CHEVRON USA, INC., a California)	
Corporation, and DOES 1 through 10,)	District Judge: Hon. Hernan D. Vera
inclusive,)	Magistrate Judge: Hon. A. Joel Richlin
)	Action Filed: August 3, 2023
Defendants.)	Pre-Trial Conference: July 29, 2025
)	Trial Date: August 19, 2025
)	
)	
)	

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
1	Agreements signed by Mark Snookal: Employee Propriety info Agreement – Cheron USA – 10/29/08 (CUSA000452-457)	Snookal			
2	Wellness Programs – 1/1/14 (CUSA0002224-2295)	Snookal			
3	Position Summary for Regional Health and Medical Manager – 5/8/15 (CUSA0001573-1575)	Dr. Levy			
4	Risk of Rupture or Dissection in Descending Thoracic Aortic Aneurysm - 9/2/15 (CUSA000619-638) Dr. Levy's Depo Exh. B	Dr. Levy			
5	Physical requirements and working conditions form for REM position 11/9/16 (CUSA000208-220)	Banks			
6	Chevron Medical Examination Program Guidelines – July 2017 (CUSA000837-944)	Dr. Levy			
7	Escravos Medevac Records for 2017-2022 (CUSA000830-833)	Dr. Adeyeye			
8	Escravos Fatalities 2017 – 2022 (CUSA000834-836)	Dr. Adeyeye			
9	Snookal's Benefits Elections – 2019 (CUSA0001879-1882)	Snookal			
10	Dental PPO Plan – 1/1/19 (CUSA0001891-1892)	Snookal			
11	Vision Plus Program – 1/1/19	Snookal			

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
	(CUSA0002067-2129)				
12	HR Policy 410 Employment of Individuals with Disabilities – 4/1/19 (CUSA00013-18)	Powers			
13	Snookal CT and echo result from Kaiser Permanente – 4/16/19 (CUSA000223-227 CUSA000818-822)	Dr. Khan			
14	Affirmative Action Program for Individuals with Disabilities & Protected Veterans – 4/1/19 – 3/31/20 (CUSA0001682-1705)	Powers			
15	Mark Snookal’s Kaiser Medical Records – 4/19/19 (Snookal-00641-643) Exh. 1 to Dr. Khan’s Depo	Snookal			
16	Job Description: NMA EGTL Reliability Engineering Manager – 5/7/19 (Snookal-01157-58)	Snookal			
17	Snookal email to Michelle Johansen re: “Discuss EGTL Reliability Engineering Manager PDC Posting” – 5/13/19 (CUSA0001081)	Snookal			
18	Email recommending Mark Snookal for the Reliability Engineering Manager position – 6/6/19 (CUSA0001435-1436)	Banks			
19	Email to Mark Snookal re Acceptance of NMA EGTL Reliability	Snookal			

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
	Engineering Manager (PSG 23-24, FL 4-6) position in Escravos, Nigeria, - 6/20/19 (CUSA0001147-1148)				
20	Assignment Offer Letter – 7/1/19 Snookal-00647-650	Snookal			
21	Email re: Mark Snookal has accepted the NMA EGTL Reliability Engineering Manager position in Escravos, Nigeria – 7/5/19 (CUSA0001748-1750)	Snookal Banks			
22	Email from Chevron to Mark Snookal re: New Assignment – 7/9/19 (CUSA0000986- 988)	Snookal			
23	Chevron Admin Expatriate Admin Email re Snookal Acceptance of Escravos assignment – 7/9/19 (CUSA000612-613)	Banks			
24	Email thread re New Assignment to Nigeria – 7/11/19 (CUSA0001238-1241)	Snookal			
25	Mental Health Questionnaire – completed by Snookal – 7/18/19 (CUSA000188)	Snookal			
26	Authorization for Disclosure of Health Information, signed – 7/18/19 (CUSA000577-578)	Snookal			
27	Mark Snookal Medical Report – 7/19/19 (CUSA000570)	Snookal Dr. Asekomeh			
28	Results from Health Evaluation performed	Snookal			

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
	on 7/19/19 (Snookal-000941)				
29	MSEA exam of Mr. Snookal completed by Dr. Sobel – 7/24/19 (Snookal-00605-610)	Dr. Sobel			
30	Dr. Irving Sobel’s voicemail message to Mark Snookal (Snookal-001925)	Snookal Dr. Sobel			
31	Emails between Snookal and Dr. Khan re: Rotational Work in Nigeria – 7/24/19 (Snookal-01284)	Snookal Dr. Khan			
32	Chevron Medical Suitability for Expatriate Assignment History & Physical Examination for Snookal – 7/24/19 (CUSA000025-30)	Snookal Dr. Sobel			
33	Dr. Khan’s letter – 7/29/19 re Snookal condition (Snookal-00665)	Snookal Dr. Khan			
34	Kaiser Permanente Medical Record for Snookal – visit date: 4/3/19; “Received 7/29/19) (CUSA00223-227)	Dr. Khan			
35	Dr. Victor Adeyeye’s Position Summary – Job Description – 2019 (CUSA0002774)	Dr. Adeyeye			
36	Dr. Ujomoti Akintunde’s Position Summary – Job Description – 2019 (CUSA0002775)	Dr. Akintunde			
37	Dr. Asekomeh Eshiofe’s Position Summary – Job	Dr. Asekomeh			

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
	Description – 2019 (CUSA0002778)				
38	Email from Dr. Asekomeh to Dr. Pitan re: Snookal medical report – 7/30/19 (CUSA0001525)	Dr. Asekomeh			
39	Email thread between Olorunfemi Pitan, Victor Adeyeye, Eshiofe Asekomeh and Henry Aiwuyo re Mark Snookal Medical Report – 7/30/19 – 8/15/19 (CUSA0001426-1429; 1486-1507; 1522-1525; 1528-1532)	Dr. Pitan Dr. Adeyeye Dr. Asekomeh Dr. Aiwuyo			
40	Immunization info – by Chevron USA employee facilitating – 8/2/19 (CUSA0001163-1168)	Snookal			
41	Email re: International Transition and Cultural Orientation invite to Snookal from US Chevron Services Company employee – 8/2/19 (CUSA0001194-1196)	Snookal			
42	Email chain re: Mark Snookal’s Medical Report – 8/5/19 (CUSA000768-770)	Dr. Adeyeye Dr. Asekomeh			
43	Email thread with Asekomeh, Akintunde re: Akintunde’s opinion (follow-up to Aiwuyo opinion) – 8/5/19 (CUSA000771-774)	Dr. Asekomeh Dr. Akintunde			
44	Escravos Cultural Orientation Session Invite by Chevron Corp Employee – 8/5/19	Snookal			

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
	(CUSA0001157-1159)				
45	Asekomeh email to Pitan re: cardiology summary and Dr. Aiwuyo – 8/7/19 (CUSA0001526-1527)	Dr. Asekomeh			
46	Dr. Asekomeh email to Dr. Olorunfemi Pitan re: Snookal medical summary – 8/7/19 (CUSA000816-823)	Dr. Asekomeh			
47	Email thread re Mark Snookal Medical Clearance “and just checking in” – 7/29/19; 8/2/19; 8/8/19 (CUSA0001009-1012; 1181-1182; 1190-1193)	Dr. Asekomeh			
48	Maintenance Change Operating Assistant (OA) Job Description – 8/11/19 (CUSA000550-551)	Snookal			
49	Expat Supervisors Engagement session email – 8/13/19 (CUSA0001162)	Snookal			
50	Email to Mark and Constance Snookal re: cultural orientation w/feedback form attachment – 8/13/19 (CUSA0001169-1171)	Snookal			
51	Meeting invite re Virtual International Transition and Cultural Orientation Escravos, Nigeria – 8/13/19 (CUSA0001077-1078; 1226-1227)	Snookal			
52	Email thread with Dr. Asekomeh to Dr. Pitan et al re: decision to “decline a job transfer	Dr. Asekomeh			

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
	to Escravos – 8/15/19 (CUSA000824-827)				
53	“Expatriate Exam Recommendations” – 8/15/19 (Snookal-01099)	Dr. Asekomeh			
54	Email from Dr. Pitan to Dr. Asekomeh – 8/15/19 (CUSA000824-827)	Dr. Asekomeh			
55	Email from Asekomeh to Bijo Velante Mirabueno – 8/15/19 (CUSA000828)	Dr. Asekomeh			
56	Sandra Spellman Nigerian Visa facilitation email – 8/14/19 - 8/15/19 (CUSA0001207-1210)	Snookal			
57	MSEA Satisfaction survey from Chevron Corp. – 8/15/19 (CUSA0001156)	Snookal			
58	Email thread re: Snookal medical report - 8/15/19 (CUSA0001520-1521; 1522-1523)	Dr. Adeyeye			
59	Email from Mark Snookal re Erin McGregor Referral – 8/15/19 (CUSA0001002)	Snookal			
60	Email thread between Dr. Frangos, Pitan, Asekomeh and Levy re MSEA Case – 8/15/19 (CUSA000824-827)	Dr. Pitan Dr. Levy			
61	Email thread Dr. Frangos to Dr. Levy and Dr. Arenyeka re: Nigeria Medical Determination – 8/20/19	Dr. Levy			

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
	(CUSA0001003-1006)				
62	Dr. Levy email thread with Dr. Arenyeka - 8/20/19 re Snookal (CUSA0001539-1542)	Dr. Levy			
63	Emails between Dr. Levy and Snookal re: medical – 8/23/19 (CUSA000639-641) Levy's Depo Ex. A	Snookal			
64	Email from Dr. Levy to Eldyleida Seca Torres re: MSEA - 8/23/19 (CUSA0001041)	Dr. Levy			
65	Email from Dr. Khan to Dr. Levy – 8/23/19 (Snookal-01091) Dr. Levy's Depo Exh. C	Dr. Khan			
66	Email from Dr. Levy to Dr. Kahn – 8/26/19 re risk of rupture – (CUSA000557-558)	Dr. Levy			
67	Email thread btwn Dr. Levy and Dr. Arenyeka re: Patient MS 8/26/19 (CUSA000995-997)	Dr. Arenyeka Dr. Levy			
68	Levy email thread – 8/29/19 (CUSA0001050-1052)	Dr. Levy			
69	Emails re Mark Snookal Remsheet Report – 8/29/19 (CUSA0001381-1385)	Snookal			
70	Emails between Sandra Spellman to Mark Snookal re: Visa Documents – 8/14/19; 8/29/19 (CUSA0001141-1146; 1149-1155; 1198-1199; 1201-1202; 1207-1210; 1225; 1242-1254)	Snookal			
71	Summary of Cardiology Opinions – NMA	Dr. Aiwauyo Dr. Adeyeye			

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
	Cardiologists (CUSA0001520-1521)	Dr. Akintunde			
72	Email thread re Mark Snookal not medically cleared – 8/30/19 (CUSA1430-1434; 1447-1450)	Dr. Levy			
73	Email to Amir Zaheer re candidate for NMA EGTL Reliability Engineering – 9/3/19 (CUSA0001358)	Zaheer			
74	Email from Andrew Powers re: the Rescinded Job Offer in Nigeria – 9/4/19 (CUSA000538-540)	Powers			
75	Emails from Andrew Powers to Dr. Ayanna Jones – 9/4/19 (CUSA000650-651)	Powers			
76	Dr. Scott Levy email “Thanks. I got this” - 9/4/19 (CUSA000983-985)	Dr. Levy			
77	Email thread between Dr. Jones Ayanna and Andrew Powers re: Rescinded Job Offer in Nigeria – 9/4/19 (CUSA000993-994)	Powers			
78	Emails re Rescinded Job Offer in Nigeria - 9/4/19 (CUSA000983-985)	Dr. Levy Powers			
79	International Journal of General Medicine Article (CUSA0002830-2834)	Dr. Adeyeye			
80	Email thread regarding Mark Snookal’s disability discrimination complaint – 9/4/19 – 9/6/19	Powers Snookal			

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
	(CUSA000542-543)				
81	Email thread re: Positions in 2H PDC - 9/5/19 (CUSA000541)	Snookal			
82	Emails Re: Nigeria Medical Determination – 9/5/19 (CUSA0001236-1237)	Snookal			
83	Email from Andrew Powers to Snookal – 9/8/19 (Snookal 00637-639)	Snookal			
84	Email thread with Powers and others – 9/4/19; 9/9/19 (CUSA000645-646)	Powers			
85	El Segundo Operating Assistant DS&C – MFG- (2 positions PSG 22-23) – 9/13/19 (CUSA000552-554)	Snookal			
86	Email from Dr. Levy to Snookal re: medical – 9/16/19 (Snookal-00645-646) (CUSA000559-650)	Dr. Levy Snookal			
87	Snookal Email re: Positions he applied – 9/24/19 (CUSA0001645-1653)	Snookal			
88	Email from Tse to Snookal re: Maintenance Change Operating Assistant – 9/25/19 (CUSA000653-655)	Snookal			
89	Email from Powers to Tse re: M & R change – 9/25/19 (CUSA000683)	Snookal			
90	Job Description for Maintenance Change Operating Assistant – 9/25/19	Snookal			

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
	(Snookal-01131-32)				
91	Job Description: DS&C – MFG – El Segundo Operating Assistant – 10/11/19 (Snookal-01150-52)	Snookal			
92	Job Description: DS&G – MFG – El Segundo Routine Maintenance General Team Lead – 10/11/19 (Snookal-01122-23)	Snookal			
93	Emails thread Austin Ruppert, Thalia Tse, and Powers re: Mark Snookal New Position – 11/6/19 (CUSA000642-643)	Tse Powers			
94	Position Summary – Reliability Change Operating Assistant – 11/6/19 (CUSA000498-500)	Banks			
95	Job Offer for Reliability Change Operating Assistant – 11/19/19 (Snookal-01136)	Snookal			
96	Email thread re: offer letter position for Mark Snookal in Workday – 11/20/19 (CUSA000679-682)	Tse Snookal			
97	Snookal's Benefits Elections – 2020 (CUSA0001883-1886)	Snookal			
98	HR Policy 1020 – Performance Management Program Effective January 2020 (CUSA000351-354)	Powers			
99	Dental PPO Plan – 1/1/20 (CUSA0001967-2066)	Snookal			
100	Wellness Program –	Snookal			

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
	1/1/20 (CUSA0002130-2223)				
101	Affirmative Action Program for Individuals with Disabilities & Protected Veterans – 4/1/20 – 3/21 (CUSA0001654-1677)	Powers			
102	Personal Experience Record GO-400-21N – 9/19/20 (CUSA000493-497; 1115-1119; Snookal 1106-1115)	Snookal			
103	Snookal's Benefits Elections – 2021 (CUSA0001887-1890)	Snookal			
104	HR Policy 225 – Protected Rates of Pay, Effective February 2021 (CUSA000355-358)	Powers			
105	Nippon Dynawave Packaging Co. Offer of Employment to Mark Snookal and signed by him – 8/3/21 (NDP-SDT 1-2; Snookal, Ex. 22)	Snookal			
106	Nippon Dynawave Packaging Benefits Guide (Snookal-01444-01477)	Snookal			
107	Email and Letter of Resignation from Mark Snookal to Thalia Tse – 8/4/21 (CUSA000656-658)	Snookal			
108	Team message from Thalia Tse to Andrew Powers – FYI Mark Snookal just submitted his resignation – 8/4/21 (CUSA000652)	Tse Powers			

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
109	Position Statement Letter from Chevron to DFEH re Snookal's complaint of discrimination – 4/5/22 (CUSA000001-35)	Scott M. Banks			
110	Letter from Chevron to DFEH – 4/5/22 (CUSA000036-41)	Scott M. Banks			
111	Chevron Response to DFEH – 12/7/22 (CUSA000238-239)	Scott M. Banks			
112	Georgia-Pacific 2023 Benefits Guide (Snookal-01478-1507)	Snookal			
113	Records Produced by Georgia-Pacific LLA re Snookal's employment post Chevron	Snookal			
114	Offer letter to Mark Snookal from Chris Lundquist at Koch Industries – 7/7/23 (Snookal 1526-1527)	Snookal			
115	Letter to Mike Savageaux from Mark Snookal resigning from Nippon Dynawave - 8/14/23 (NDP-SDT 3; Snookal, Ex. 23)	Snookal			
116	Plaintiff Mark Snookal's Objections and Responses to Deft Chevron USA, Inc.'s Interrogatories, Set One – 3/28/24	Snookal			
117	Deft Chevron's Responses to Plaintiff Snookal's Request for Production of Documents, Set One – 6/5/24	Scott M. Banks			

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
118	Plaintiff Mark Snookal's Rebuttal Expert Disclosures (FRCP Rule 26(a)(2) – 9/3/24 (Marmureanu M.D., Exh. 1)	Dr. Marmureanu			
119	Dr. Alexander Marmureanu's CV	Dr. Marmureanu			
120	Expert Report of Dr. Alexander Marmureanu – 10/9/24	Dr. Marmureanu			
121	Deft Chevron's Supplemental Responses to Plaintiff Snookal's Special Interrogatories Nos. 20-24, Set Two – 1/13/25	Harpreet K. Tiwana			
122	Deft Chevron's Objections and Responses to Plaintiff Snookal's Request for Production of Documents, Set Four (Nos. 47-66) – 2/25/25	Tiwana			
123	Deft Chevron's Response to Plaintiff's Interrogatory No. 26 - 33 - 2/25/25	Tiwana			
124	Chevron's Objections and Supplemental Responses to Plaintiff Snookal's Interrogatories, Set Three – 4/25/25	Tiwana			
125	Location Premiums by Area of Assignment (CUSA000501-502)	Snookal			
126	Cover page to the Chevron Tax Equalization Policy, Human Resources Shared Services	Powers			

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
	(CUSA000503 – Powers, Exh. 2)				
127	Chevron Tax Equalization Policy (CUSA000503)	Powers			
128	HR Policy 400 for U.S. Payroll Employees (CUSA000348-350)	Powers			
129	HR Policy 410 for U.S. Payroll Employees (CUSA000014-18)	Powers			
130	Rotational Expatriate Assignments (Snookal-01285-1301)	Snookal			
131	Snookal Personal Experience Record (CUSA000261-265)	Snookal			
132	Chevron Employee Handbook – El Segundo Refinery (CUSA000298-342)	Powers			
133	General Team Leader/Area Maintenance Lead PSG 23 Position Summary (CUSA000548-549)	Banks			
134	DS&C – MFG - El Segundo Routine Maintenance General Team Lead (PSG 23) (CUSA000555-556)	Banks			
135	Scott Levy’s CV (CUSA0001565-1572)	Dr. Levy			
136	Victor Adeyeye’s CV (CUSA0001737-1741)	Dr. Adeyeye			
137	Anthony Edward Reading’s CV and documents relied upon by Dr. Reading	Dr. Reading			
138	Anthony E. Reading PhD Rule 26 Log (Snookal-02056-2064)	Dr. Reading			
139	Dr. Asekomeh Eshiofe CV	Dr. Asekomeh			

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
	(CUSA0002776-2777)				
140	Corporate Governance Policies (CUSA0001730-1735)	Powers			
141	Chevron Retirement Plan for Employees hired on or after January 1, 2008 (CUSA0001759-1802)	Powers Banks			
142	Employee Savings Investment Plan eff. January 1, 2020 (CUSA0001803-1878)	Banks			
143	Chevron Medical HMO Plan – Kaiser So. CA (CUSA0001893-1966)	Banks			
144	Dr. Charles Baum CV	Dr. Baum			
145	Dr. Charles Baum Report and Documents relied upon	Dr. Baum			
146	Andrew Powers’s Chevron Profile (CUSA000945-946)	Powers			
147	Thalia L. Tse’s Chevron’s Profile (CUSA000947-948)	Tse			
148	Snookal’s Chevron Exit Interview (CUSA000544-547)	Snookal			
149	Incidence of Aortic Rupture and Aortic Dissection in a 4.2. cm Ascending Aortic Aneurysm (Marmureanu M.D., Ex. 3)	Dr. Marmureanu			
150	Mark Snookal Chevron Pay Statements (CUSA0001053-1074; 1082-1113; 1120-1140; 1214-1222; 1351-1354)	Banks			
151	Expert Report and CV of Chen Song, Ph.D.	Dr. Song			

1 DATED: July 1, 2025

ALLRED, MAROKO & GOLDBERG

2
3 By: /s/ Dolores Y. Leal

DOLORES Y. LEAL

4 OLIVIA FLECHSIG

Attorneys for Plaintiff,

5 MARK SNOOKAL

6
7
8 DATED: July 1, 2025

SHEPPARD, MULLIN, RICHTER & HAMPTON LLC

9
10 By: /s/ Tracey A. Kennedy

TRACEY A. KENNEDY

11 ROBERT E. MUSSIC

12 H. SRAH FAN

Attorneys for Defendant

13 CHEVRON U.S.A. INC.,

14 a Pennsylvania Corporation